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Services, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

OPTEUM FINANCIAL SERVICES, LLC,

Plaintiff,

vs.

KAY-CO INVESTMENTS, INC. dba PRO30
FUNDING, and DOES 1 through 20,

Defendants.

No. C-07-0873 MHP

**STIPULATION AND ~~PROPOSED~~
ORDER CONTINUING CASE
MANAGEMENT CONFERENCE**

IT IS HEREBY STIPULATED by and between plaintiff Opteum Financial Services, LLC and defendant Kay-Co Investments, Inc., through their respective attorneys of record, that the case management conference set for May 21, 2007 at 4:00 p.m. be continued to July 2, 2007 at 4:00 p.m., or such other time convenient for the Court. In addition, the parties stipulate that Rule 26 initial disclosures and the initial case management statement with discovery plan will now be due on June 25, 2007. Good cause exists for this request because the parties have agreed to a mediation of the case, currently scheduled for June 11, 2007.

REED SMITH LLP
A limited liability partnership formed in the State of Delaware

1 DATED: May 3, 2007.

2 REED SMITH LLP

3
4 By /s/ Terence N. Hawley
5 Terence N. Hawley
6 Attorneys for Plaintiff
Opteum Financial Services, LLC

7 DATED: May 3, 2007.

8 DUANE MORRIS LLP

9
10 By /s/ Gregory G. Iskander
11 Eric J. Sinrod
12 Gregory G. Iskander
13 Attorneys for Defendants
14 Kay-Co Investments, Inc. dba PRO30 Funding

15
16 **[PROPOSED] ORDER**

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18 Upon reading the above Stipulation, and good cause appearing, IT IS HEREBY ORDERED
19 that the case management conference in this case, currently scheduled for May 21, 2007 at 4:00 p.m.
20 is continued to July 2, 2007 at 4:00 p.m. Rule 26 initial disclosures and the initial case management
21 statement with discovery plan are due on June 25, 2007.

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23 DATED: May 9, 2007 _____.

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